

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION**

CONSOLIDATED INDUSTRIES, LLC
d/b/a WEATHER KING PORTABLE
BUILDINGS,

Plaintiff,

v.

JESSE A. MAUPIN, BARRY D. HAR-
RELL, ADRIAN S. HARROD, LOGAN
C. FEAGIN, STEPHANIE L. GILLES-
PIE, RYAN E. BROWN, DANIEL J.
HERSHBERGER, BRIAN L. LASSEN,
ALEYNA LASSEN, and AMERICAN
BARN CO., LLC,

Defendants.

Civil Action No. 1:22-cv-01230

District Judge Anderson

Magistrate Judge York

**MOTION TO WITHDRAW AS COUNSEL FOR DEFENDANTS
ALEYNA LASSEN AND BRIAN L. LASSEN**

Attorneys Thomas G. Pasternak and Benjamin S. Morrell (“Counsel”) of Taft Stettinius & Hollister LLP respectfully move to withdraw as counsel of record for Defendants Aleyna Lassen and Brian L. Lassen (the “Lassen Defendants”), pursuant to Local Rule 83.5. The grounds for this motion are as follows:

1. Counsel have appeared on behalf of all Defendants in this lawsuit, including the Lassen Defendants.
2. Counsel and the Lassen Defendants have developed irreconcilable differences that make Counsel’s continued effective representation of the Lassen Defendants in this lawsuit unreasonably difficult.
3. Counsel and the Lassen Defendants have made good faith efforts to resolve their

differences but have reached an impasse.

4. On October 21, 2024, the Lassen Defendants informed Counsel in writing of their wish to terminate the attorney-client relationship.

5. As a result, Counsel seek to withdraw from representation of the Lassen Defendants.

6. Given that fact discovery is ongoing and the Court recently granted the parties' joint motion to extend the deadlines in the current scheduling order (D.E. 149), Counsel's withdrawal at this stage will not result in undue delay of these proceedings, nor will it result in undue prejudice to any party to this litigation.

7. The Lassen Defendants have a reasonable opportunity to obtain replacement counsel prior to trial.

8. The name of substitute counsel is not known. Accordingly, pursuant to Local Rule 83.5, the names, addresses, and telephone numbers of the Lassen Defendants are set forth below. Additionally, the certificate of service accompanying this motion sets forth Counsel's efforts to serve this motion on the Lassen Defendants.

Brian L. Lassen
1405 N. Fort Grant Road
Willcox, AZ 85643
520-471-0205

Aleyna Lassen
1405 N. Fort Grant Road
Willcox, AZ 85643
520-987-0111

9. Counsel will continue to represent Defendants Maupin, Harrell, Harrod, Feagin, Gillespie, Brown, Hershberger, and American Barn Co., LLC in this lawsuit.

10. Counsel has submitted a proposed order regarding this motion to the appropriate ECF mailbox.

For these reasons, Counsel respectfully requests entry of an order granting them leave to

withdraw as counsel of record for the Lassen Defendants.

Date: October 22, 2024

/s/ Benjamin S. Morrell

Thomas G. Pasternak (admitted pro hac vice)

Benjamin S. Morrell (TBPR No. 035480)

TAFT STETTINIUS & HOLLISTER LLP

111 East Wacker Drive, Suite 2600

Chicago, IL 60601

Telephone: (312) 527-4000

Facsimile: (312) 527-4011

tpasternak@taftlaw.com

bmorrell@taftlaw.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on the date listed below, I filed the foregoing document with the Clerk of the Court using the Court's CM/ECF filing system, which will send notice of such filing to all counsel of record. I further certify that on the date listed below, I sent the foregoing document to the following individuals at the address listed below via U.S. Mail first-class, postage prepaid, and via email at the email address listed below:

Aleyna Lassen
Brian L. Lassen
1405 N. Fort Grant Road
Willcox, AZ 85643
willcoxbuildings@pm.me

Date: October 22, 2024

/s/ Benjamin S. Morrell